

1 UNITED STATES DEPARTMENT OF JUSTICE
CIVIL DIVISION

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12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

14 **In re:**

15 **PG&E CORPORATION**

16 **- and -**

17 **PACIFIC GAS AND ELECTRIC**
18 **COMPANY,**

Debtors.

) Bankruptcy Case

) No. 19-30088 (DM)

) Chapter 11

) (Lead Case)

) (Jointly Administered)

) Date: May 19, 2020

) Time: 10:00 a.m.

) Ctrm: 17

) Judge: Dennis Montali

19 ☐ Affects PG&E Corporation

20 ☐ Affects Pacific Gas and Electric Company

21 ☒ Affects both Debtors

22 *All papers shall be filed in the Lead Case,*
23 *No. 19-30088 (DM).*

24
25 **JOINDER OF THE UNITED STATES OF AMERICA IN THE CALIFORNIA STATE**
26 **AGENCIES' OBJECTIONS TO CONFIRMATION OF DEBTORS' AND SHAREHOLDER**
27 **PROPOSERS' JOINT CHAPTER 11 PLAN OF REORGANIZATION**
28 **DATED MARCH 16, 2020 [DOCKET NO. 6320]**

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2 The United States of America, on behalf of various federal agencies, hereby joins in the
3 *California State Agencies' Objections to the Confirmation of the Debtors' and Shareholder Proponents'*
4 *Joint Chapter 11 Plan of Reorganization Dated March 16, 2020* ("Objection") [Docket No 7281].¹
5 Specifically, the United States joins in the arguments made in sections A., B., and E. through H. of the
6 Objection that this Court should not confirm the Plan. In addition, the United States incorporates by
7 reference herein the arguments made in support of its *Objection to Schedule of Executory Contracts and*
8 *Unexpired Leases to Be Assumed Pursuant to the Plan and Proposed Cure Amounts* [Docket No. 7273].

9 As noted in the Objection, the United States, with the California State Agencies, have been
10 negotiating language for the Plan and the Confirmation Order to resolve these objections with the Plan
11 Proponents, the TCC, and others, and remains amenable to continuing those negotiations prior to the
12 Confirmation Hearing.

13 Date: May 15, 2020

Respectfully submitted,

14 JOSEPH H. HUNT
15 Assistant Attorney General
16 DAVID L. ANDERSON (CABN 149604)
United States Attorney

17 /s/ Matthew J. Troy
18 RUTH A. HARVEY
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19 RODNEY A. MORRIS
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21 Attorneys for the United States
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27 ¹ Terms not otherwise defined herein shall have the meaning ascribed to them in the *Debtors'*
28 *and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March, 2020* [Docket.
No. 6320].

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 15, 2020, I electronically filed the foregoing Objection with the Clerk
3 of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF
4 participants.

5 /s/ Matthew J. Troy
6 Senior Trial Counsel
7 Attorney for United States
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